

## Exhibit D

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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AMERICAN INSURANCE COMPANY  
a/s/o Mariah Carey, and SINCLAIR C.S.  
BEECHAM

Plaintiffs,  
against

CORN ASSOCIATES, LLC. THE  
FRANKLIN TOWER CONDOMINIUM,  
KATZ METAL FABRICATORS, INC., and  
SAMCO PLUMBING, INC.,  
Defendants.

CERTIFICATE OF DEFAULT AGAINST  
SAMCO PLUMBING, INC.

Docket No.: 1:07 cv 08604

I, J. Michael McMahon, Clerk of the United States District Court for the Southern District of New York, do hereby certify that this action commenced on October 4, 2007 with the filing of a summons and complaint, a copy of the summons and complaint was served on defendant on October 10, 2007. Service was made by serving true copies to Carol Vogt, Agent for Service at Secretary of State, who is authorized to accept service on behalf of defendant. Proof of such service thereof was filed on October 31, 2007. I further certify that the docket entries indicate that the defendant has not filed an answer or otherwise moved with respect to the complaint herein.

On March 25, 2008, Plaintiff served the Second Amended Complaint upon the parties. On March 26, 2008, Plaintiff filed the Second Amended Complaint. I further certify that the docket entries indicate that the defendant has not filed an answer or otherwise moved with respect to the Second Amended Complaint herein. The default of the defendant is hereby noted.

Dated: New York, New York

June 6, 2008

J. MICHAEL McMAHON  
Clerk of the Court

By:   
Deputy Clerk